

JAN 17 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

v.

(1) KEON DEANGELO STEELE

(2) ANNA MICAIAH DENISE MACK

DOCKET NO. 3:24-cr-11-MOC

BILL OF INDICTMENT

Violations:

18 U.S.C. §922(a)(1)(A)

18 U.S.C. §922(o)

18 U.S.C. §922(g)

18 U.S.C. §922(a)(6)

THE GRAND JURY CHARGES:

COUNT ONE

(Dealing Firearms Without a License)

Beginning on or about May 19, 2023, and continuing until no later than July 6, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) KEON DEANGELO STEEL

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

(Transfer and Possession of a Machine Gun)

On or about June 16, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) KEON DEANGELO STEELE

knowingly and willfully possessed and transferred a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(24), to wit: a machine gun conversion device, commonly referred to as a Glock Switch, in violation of Title 18, United States Code, Sections 922(o) and

924(a)(2).

COUNT THREE

(Possession of a Firearm by a Felon)

On or about June 16, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) KEON DEANGELO STEELE

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: a Glock, model 19, Gen 5 pistol, and a Taurus, model TX22, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

(Transfer and Possession of a Machine Gun)

On or about June 23, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) KEON DEANGELO STEELE

knowingly and willfully possessed and transferred a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(24), to wit: two (2) machine gun conversion devices, commonly referred to as Glock Switches. In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FIVE

(Possession of a Machine Gun)

On or about July 6, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) KEON DEANGELO STEELE

knowingly and willfully possessed a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(24), to wit: a Glock; model 22; .40 caliber pistol with an affixed machinegun conversion device, commonly referred to as a Glock Switch. All in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT SIX

(Possession of a Firearm by a Felon)

On or about July 6, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) KEON DEANGELO STEELE

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: one (1) Glock, model 22, .40 caliber pistol and one (1) Glock, model 42, 9mm pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

(False Statement During Purchase of a Firearm)

On or about June 13, 2023, in Gaston County, within the Western District of North Carolina, the defendant,

(2) ANNA MICIAIAH DENISE MACK

in connection with the acquisition of one or more firearms, those being, one (1) Glock 22 handgun and one (1) Glock 48 handgun from Bill's Pawn & Gun, located at 351 E. Franklin Blvd, Gastonia, North Carolina, a licensed firearm dealer within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to Bill's Pawn & Gun, which was intended and likely to deceive Bill's Pawn & Gun, as to a material fact to the lawfulness of such sale of one or more firearms to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction record, within which the defendant represented herself to be the actual transferee/buyer of the firearms and not to be acquiring the firearms on behalf of another person, when in fact the defendant knew she was acquiring the firearms for another person, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT EIGHT

(False Statement During Purchase of a Firearm)

On or about June 16, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(2) ANNA MICIAIAH DENISE MACK

in connection with the acquisition of one or more firearms, those being, one (1) Springfield Armory XDS handgun and one (1) Radical Arms RF-15 rifle from The Gun Outlet & Pawn, located at 5115 N. Tryon St., Charlotte, North Carolina, a licensed firearm dealer within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to The Gun Outlet & Pawn, which was intended and likely to deceive The Gun Outlet & Pawn, as to a material fact to the lawfulness of such sale of one or more firearms to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction record, within which that the defendant represented herself to be the actual transferee/buyer of the firearms and not to be acquiring the firearms on behalf of another person, when in fact the defendant knew she was acquiring the firearms for another person, in violation of Title 18, United States Code, Sections 922(a)(6) and

924(a)(2).

COUNT NINE

(False Statement During Purchase of a Firearm)

On or about June 16, 2023, in Gaston County, within the Western District of North Carolina, the defendant,

(2) ANNA MICIAIAH DENISE MACK

in connection with the acquisition of a firearm, that being, one (1) Taurus PT22 handgun from Bobby's Pawn & Gun located at 351 E. Franklin Blvd, Gastonia, North Carolina, a licensed firearm dealer within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to Bobby's Pawn & Gun, which was intended and likely to deceive Bobby's Pawn & Gun, as to a material fact to the lawfulness of such sale of one or more firearms to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives from 4473, Firearms Transaction record, within which the defendant represented herself to be the actual transferee/buyer of the firearms and not to be acquiring the firearms on behalf of another person, when in fact the defendant knew she was acquiring the firearms for another person, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TEN

(False Statement During Purchase of a Firearm)

On or about June 21, 2023, in Gaston County, within the Western District of North Carolina, the defendant,

(2) ANNA MICIAIAH DENISE MACK

in connection with the acquisition of a firearm, that being, one (1) Glock 42 handgun from South Gastonia Gun & Pawn, located at 1830 S. York Rd., Gastonia, North Carolina, a licensed firearm dealer within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to South Gastonia Gun & Pawn, which was intended and likely to deceive South Gastonia Gun & Pawn, as to a material fact to the lawfulness of such sale of the firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives from 4473, Firearms Transaction record, within which the defendant represented herself to be the actual transferee/buyer of the firearm and not to be acquiring the firearm on behalf of another person, when in fact the defendant knew she was acquiring the firearm for another person, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 924, 26 U.S.C. § 5872, and/or 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 853, 924, 5872, and/or 2461(c):

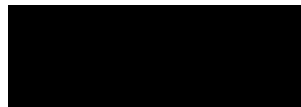
- (a) All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- (b) All property used or intended to be used in any manner or part to commit or facilitate such violations;
- (c) All firearms or ammunition involved or used in such violations; and
- (d) If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b), and (c).

The Grand Jury finds probable cause to believe that the following property subject to forfeiture on the grounds stated above:

- (a) Polymer 80, Pistol, no serial number and all associated magazines and ammunition seized on or about May 19, 2023
- (b) Glock 45 pistol, SN: BYHW807 and all associated silencers, magazines and ammunition seized on or about June 6, 2023.
- (c) Glock 30 pistol, SN: BXDY012 and all associated magazines and ammunition seized on or about June 13, 2023.
- (d) Glock 48 pistol, SN: BTYM023 and all associated magazines and ammunition seized on or about June 14, 2023.
- (e) Glock 22, Gen 5, SN: BSLV317 and all associated magazines and ammunition seized on or about June 14, 2023.
- (f) Glock 19, Gen 5, SN: BUPR807 and all associated magazines and ammunition seized on or about June 16, 2023.
- (g) Taurus TX22, SN: 1PT031474 and all associated magazines and ammunition seized on or about June 16, 2023.
- (h) Glock 23 pistol SN: PUD064 and all associated magazines and ammunition seized on or about June 21, 2023.
- (i) Glock 19, pistol SN: AGRY370 and all associated magazines and ammunition seized on or about June 21, 2023.
- (j) Springfield Armory XDS, SN: BY228708 and all associated magazines and ammunition seized on or about June 21, 2023.
- (k) Radical Firearms RF-15, SN: 21-094395 and all associated magazines and ammunition seized on or about June 21, 2023.
- (l) Glock 42 pistol, SN: AGTB141 and all associated magazines and ammunition seized on or about July 6, 2023.


(m) Glock 22 pistol, SN: AKR692 and all associated magazines and ammunition seized on or about July 6, 2023.

A TRUE BILL



~~FORE~~PERSON

DENA J. KING
UNITED STATES ATTORNEY



BRANDON L. BOYKIN
ASSISTANT UNITED STATES ATTORNEY